



# SLAUGHTER, REAGAN & COLE LLP

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April 26, 2019

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Mr. Deryck Roberts  
Air Quality Inspector II  
Toxics Unit  
South Coast Air Quality Management District  
21865 Copley Drive,  
Diamond Bar, CA 91765

Re: **In Re: 210 W. Slauson Ave. (Notice F10153)**

Dear Mr. Roberts:

Our firm has been retained to represent the interests of the Devore Family with respect to the property located at 210 W. Slauson Avenue, Los Angeles, California (the "subject property"). We are in receipt of the South Coast Air Quality Management District ("SCAQMD") Notice to Comply dated April 18, 2019 (Notice F10153) (the subject "Notice") (Exhibit "A"). Our response and compliance with the requests of the SCAQMD shall not be deemed as any admission(s) on behalf of my clients, who expressly deny any and all liability related to the incident which occurred on or about March 17, 2019 related to the tanker truck on the subject property without the Devores' knowledge and permission.

Nevertheless, the Devores are committed to working with all regulatory agencies to reach a resolution of this matter and to comply with all necessary requirements. As you are aware, CleanHarbors was immediately hired to address the site and we have subsequently retained consultant Brett Bowyer of Bowyer Environmental Consulting to ensure that this issue is dealt with as promptly and efficiently as possible.

Your Notice dated April 18, 2019 had a compliance date of April 26, 2019. In response, Mr. Bowyer advised that the requested asbestos sampling was proceeding with a requested modification that the sealed containers not need be tested as the containers are set to be profiled for disposal. Mr. Bowyer advised that if the modification were approved, the other asbestos testing could be completed by April 25, 2019, with "A report of findings, along with the other requested documents will be provided by May 1st."

We then received a response that the proposed Notice to Comply amend date was approved, with the caveat that any further extension or amendments would need additional approval. However, on April 23, 2019 we then received another email stating that the extension

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only was for the sampling aspect and that the requested documents would still need to be turned in prior to the notice due date.

In terms of the documents requested, it is our understanding that SCAQMD has requested the following:

1. Contracts (Leases between Owner and Lessees)
2. Building and Safety Permits
3. Business Licenses of Owner and Lessees
4. Prior Asbestos Surveys
5. Asbestos Removal Notification to SCAQMD
6. Hazardous Waste Manifests

We have attempted to collect any and all responsive documents in our possession, custody, or control in the limited time period provided. The statuses of the requested documents are as follows:

1. Contracts (Leases between Owner and Lessees)
  - a. The leases between the Owner and Lessees are being provided and are attached as Exhibits "B" and "C". For ease of reference, as to the tenants, the 210 Slauson property is commonly referred to as Parcel "A" and 206 Slauson is commonly referred to as Parcel "B".
2. Building and Safety Permits
  - a. One permit for a 100 AMP service and two sub-panels was obtained through an on-line records search. A copy of the search is attached as Exhibit "D." However, we are continuing our investigation.
3. Business Licenses of Owner and Lessees
  - a. We are uncertain as to what license from the Owner is being requested. We are providing a copy of the property manager Canon Business Properties Inc.'s Department of Real Estate license. Copies are attached as Exhibit "E". As to the tenants:
    - i. (Parcel A – 210) We have been unable to locate Karlen Galstyan dba KG Road Service since the incident. We have a copy of the driver's license that he provided with his rental application, if you would like that please let us know. We do not have any other business license on file for him.
    - ii. (Parcel B – 206) We are not presently in possession of any business licenses for tenant Byung Chun Choung. Mr. Choung has retained separate legal counsel and may be contacted through Kevin Hong of Law Offices of Kim, Au & Associates (213) 252-8008. We have requested that Mr. Hong provide us with any relevant permits or business licenses related to Mr. Choung.
4. Prior Asbestos Surveys
  - a. We are not presently aware of any prior asbestos surveys for the vacant lot property. However, we are continuing our investigation.

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5. Asbestos Removal Notification to SCAQMD
  - a. We are not presently aware of any prior asbestos removal notifications for the vacant lot property. However, we are continuing our investigation.
6. Hazardous Waste Manifest
  - a. We researched the DTSC Hazardous Waste Tracking System ([https://hwts.dtsc.ca.gov/report\\_list.cfm](https://hwts.dtsc.ca.gov/report_list.cfm)). No records associated with the Site (206 and 210 W. Slauson) were obtained through this search. However, we are continuing our investigation.

We are working diligently to try and comply with SCAQMD's requests. Please let us know if this satisfies your requests and/or what more we can provide. If the provided information is not sufficient, we respectfully request an extension of time to continue our investigation. Please do not hesitate to contact me with any questions or concerns. Thank you.

Very Truly Yours,

SLAUGHTER, REAGAN & COLE, LLP



Michael B. Lebow

MBL/ss

Attachments: Exhibits A-H